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June 8, 2020

BY ECF

Honorable Vernon S. Broderick  
United States District Court for the Southern District of New York  
40 Foley Square, Courtroom 518  
New York, NY 10007


Re: *Preferred Freezer Services, LLC v. Americold Realty Trust*, No. 19-cv-02926 (VSB)

Dear Judge Broderick:

We are counsel to Plaintiff Preferred Freezer Services, LLC ("PFS"). Pursuant to Rule 1(G) of the Court's Individual Rules & Practices in Civil Cases, we write on behalf of all parties to request an extension of certain deadlines set forth in the Court's Order of March 16, 2020, which among other things, set the parties' stipulated deadlines for Americold to respond to the Complaint by April 10, 2020, and for PFS to respond to any motion in respect of the complaint by June 9, 2020. (ECF No. 38).

PFS has since sought and obtained Americold's consent to PFS' filing of an Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2). This is the parties' first request for an extension related to the filing of an amended pleading. In light of the ongoing challenges facing the parties and their counsel as a result of the current COVID-19 health crisis and related disruptions to normal business operations, the parties respectfully propose to stipulate the following:

- PFS shall file its Amended Complaint by June 26, 2020, and
- PFS shall not seek to extend the time to respond to any subsequent motion to dismiss the Amended Complaint filed by Americold.

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 6/9/2020

Respectfully submitted,

/s/ Mala Ahuja Harker

Mala Ahuja Harker

Defendant's previous motion to dismiss (Doc. 41), is DENIED as moot without prejudice to refile in accordance with Rule 15. The Clerk of Court is directed to terminate the open motion at Document 41.  
cc: All counsel (via ECF)